

EXHIBIT 1

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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JOEL VANGEHLUWE, et al.,

Plaintiffs,

v.

GOTNEWS, LLC, et. al.

Defendants.

Case No.: 2:18-cv-10542-LJM-EAS

**DEFENDANT GOTNEWS, LLC's
OFFER OF JUDGMENT TO
JEROME VANGHELUWE**

Defendant GotNews, LLC ("GotNews") makes the following offer of judgment under Fed. R. Civ. P. 68 to Plaintiff Jerome Vangheluwe. Defendant makes this offer more than 14 days before the date set for trial in accordance with Fed. R. Civ. P. 68(a).

Plaintiffs allege tort claims based on journalistic reporting by GotNews, based upon research performed by third parties relying on public records, that Plaintiff Joel Vangheluwe was the individual who drove the car involved in an automobile killing in Charlottesville, Virginia.

Pursuant to Fed. R. Civ. P. 68, GotNews hereby offers Plaintiff Jerome Vangheluwe to take a judgment against it in this action to include the following: **The total sum of \$19,990, inclusive of Plaintiffs Jerome Vangheluwe's costs (including Plaintiff Jerome Vangheluwe's attorneys' fees), accrued to the date of this offer, to be paid by GotNews, for all causes of action and claims for damages set forth in Plaintiffs' Amended Complaint as to GotNews.**

This offer is unconditional. This judgment shall be in full satisfaction of all federal and state law claims or rights that Plaintiff Jerome Vangheluwe may have to damages, or any other form of relief, arising out of the alleged acts or omissions of GotNews, or any official, employee, or agent, either past or present, of GotNews, or any agency thereof, in connection with the facts and circumstances that are the subject of this action.

This offer of judgment is made for the purposes specified in Fed. R. Civ. P. 68 and is not to be construed as an admission of liability by GotNews, or any official, employee, or agent of GotNews, nor is it an admission that Plaintiff Jerome Vangheluwe has suffered any damages.

Acceptance of this offer of judgment will act to release and discharge GotNews, its successors and/or assigns, and all past and present officials, employees, representatives, and agents of GotNews from all claims that were or could have been alleged by Plaintiff Jerome Vangheluwe in the above-referenced action.

This offer of judgment will remain open and irrevocable for 14 days after service in accordance with Fed. R. Civ. P. 68(a). If Plaintiff Jerome Vangheluwe does not accept within 14 days after service, the offer is considered withdrawn in accordance with Fed. R. Civ. P. 68(b).

Dated: May 16, 2018

Respectfully Submitted,

/s/ Marc J. Randazza

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of May 2018, I served a true and correct copy of the foregoing document via electronic mail and U.S. Mail upon counsel for Plaintiffs listed below:

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Respectfully Submitted,



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